

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re SONY BMG CD TECHNOLOGIES	:	Civil Action No. 1:05-cv-09575-NRB
LITIGATION	:	
	:	<u>CLASS ACTION</u>
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This Document Relates To:	:	DECLARATION OF DIANA SCHNEIDER
	:	IN SUPPORT OF THE RICCIUTI CLASS
ALL ACTIONS.	:	REPRESENTATIVES' MEMORANDUM OF
	:	LAW IN SUPPORT OF MOTION FOR AN
<hr/>	X	AWARD OF ATTORNEYS' FEES AND
		REIMBURSEMENT OF EXPENSES

1. I am an investigator with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for plaintiffs in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I have completed a background search on Rosemary M. Rivas, an attorney at the law firm of Girard Gibbs & De Bartolomeo LLP, and Dora Maria Rivas, a named plaintiff in the above-captioned litigation.

3. Based on my review of this information, and my 15 years of experience as an investigator, I have concluded that Ms. Dora Rivas and Ms. Rosemary Rivas are related to each other, and are most probably sisters. This conclusion is based on the following facts:

(a) Ms. Dora Rivas and Ms. Rosemary Rivas were born within three years of each other;

(b) Ms. Dora Rivas and Ms. Rosemary Rivas have social security numbers both issued in Texas between the dates of January 1, 1987 and December 31, 1987;

(c) Ms. Dora Rivas and Ms. Rosemary Rivas have four prior addresses in common in four separate cities in California;

(d) Ms. Dora Rivas and Ms. Rosemary Rivas share common possible relatives; and

(e) Ms. Dora Rivas and Ms. Rosemary Rivas jointly own property in Tracy, California.

4. Although all information available through the background search is public, based on an abundance of caution for the privacy of Ms. Dora Rivas and Ms. Rosemary Rivas, the background search that I performed is not attached to this declaration. If however, the factual accuracy of my

findings is challenged by Girard Gibbs & De Bartolomeo LLP or its co-counsel, I could present the background search to this Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day of April, 2006, at San Francisco, California.

A handwritten signature in black ink, appearing to read 'Diana Schneider', is written over a horizontal line.

DIANA SCHNEIDER

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